

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE
vs.	:	
	:	NO. 1:20-cv-05233-SEG
NORTHBROOK INDUSTRIES,	:	
INC., D/B/A UNITED INN AND	:	
SUITES,	:	
	:	CONSENT MOTION
Defendant.	:	

**PLAINTIFF’S CONSENT MOTION TO MODIFY PROTECTIVE
ORDER THROUGH TRIAL**

Plaintiff files this consent motion to modify the existing protective order protecting Plaintiff’s identity so that the parties may be permitted to refer to Plaintiff during the trial by her first name only. The parties will confer about the best way to identify for the jury panel Plaintiff and any of her family members who may be called as witnesses, as well as a process for handling any exhibits that may identify Plaintiff and are published in the courtroom.¹

¹ This motion reflects the approach approved by Judge Calvert in the *Red Roof* litigation. *See W.K., et al., v. Red Roof Inns, Inc., et al.*, Case 1:20-cv-05263-VMC, Doc. 506 (N.D.Ga. June, 3, 2024).

Plaintiff's undersigned counsel has conferred with Defendant's counsel about the relief requested herein and represents to the Court that Defendant consents.

This 4th day of July, 2025.

/s/ David H. Bouchard
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Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing pleading has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Plaintiff, through her attorneys, has served a true and correct copy of the foregoing pleading into this District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Dated: This 4th day of July, 2025.

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